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11
12 **THE UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 MA OLIVIA ABAD,

15 Plaintiff,

16 v.

17 EQUIFAX INFORMATION SERVICES, LLC;
18 EXPERIAN INFORMATION SOLUTIONS,
19 INC.; JPMORGAN CHASE BANK, N.A.;
20 CITIBANK, N.A.; SYNCHRONY
21 FINANCIAL; CAPITAL ONE BANK, NA;
22 BANK OF AMERICA CORPORATION;
23 AMERICAN EXPRESS, INC.; and
24 DISCOVER BANK,

25 Defendants.

Case No. 2:25-cv-00090-CDS-DJA

26 **JOINT MOTION**
27 **~~STIPULATION TO EXTEND TIME FOR~~**
28 **BANK OF AMERICA, N.A. TO RESPOND**
TO PLAINTIFF'S COMPLAINT

(First Request)

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiff Ma Olivia Abad ("Plaintiff"), and counsel for Defendant Bank of America, N.A. (erroneously named Bank of America Corporation) ("Defendant or BANA"), that the time for BANA to respond to Plaintiff's Complaint is extended up to and including March 13, 2025.

On January 14, 2025, Plaintiff filed her Complaint [ECF No. 1]. BANA was served with Plaintiff's Complaint on January 22, 2025. The deadline for BANA to respond to Plaintiff's Complaint is February 11, 2025. The Parties have discussed extending the deadline for BANA to respond to Plaintiff's Complaint to allow for additional time to complete the investigation of the allegations and continue to discuss early resolution of the matter.

1 This is the first request for an extension of time for BANA to file its responsive pleading. The
2 extension is requested in good faith and is not for purposes of delay or prejudice to any other party.

3
4 DATED: February 11, 2025

LAW OFFICE OF KEVIN L. HERNANDEZ

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6 By: /s/ George Haines

7 George Haines, Esq.
8 Nevada Bar No. 9411
9 Attorney for Plaintiff
Ma Olivia Abad

10 DATED: February 11, 2025

WRIGHT FINLAY & ZAK, LLP

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12 By: /s/ Jory C. Garabedian

13 Jory C. Garabedian, Esq.
14 Nevada Bar No. 10352
15 Attorney for Defendant
Bank of America, N.A.

16 Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or
17 their attorneys will be treated - and must be filed - as a joint motion. The Court thus treats
18 this filing as a joint motion and will expect that future filings follow Local Rule 7-1(c). The
19 Court GRANTS the joint motion (ECF No. 16).

20 
UNITED STATES MAGISTRATE JUDGE

21 DATED: 2/12/2025
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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b) and Electronic Filing Procedure IV(B), I certify that on 11th day of February, 2025, a true and correct copy of the foregoing **STIPULATION TO EXTEND TIME FOR BANK OF AMERICA, N.A. TO RESPOND TO PLAINTIFF'S COMPLAINT** was transmitted electronically through the Court's e-filing electronic system to the attorney(s) associated with this case.

/s/ Jason Craig

An Employee of WRIGHT, FINLAY & ZAK, LLP